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OFFICE OF THE
EXECUTIVE SECRETARY

**Comments of NAIFA – Tennessee on proposed
amendments to the Telephone Solicitation Regulations – Do Not
Call Register
August 18, 2000**

00-00522

(Please Note: NAIFA – Tennessee is the association of the life and health insurance agents of the state and was the Tennessee Association of Life Underwriters until July 1, 2000.)

The life and health insurance agents of Tennessee represented by NAIFA-Tennessee support the Do Not Call Register concept. We do not wish to telephone citizens for whom the phone call is a negative experience and who, therefore, do not want to speak with us, much less do business with us.

The current regulations and the proposed amendments, however, are geared entirely to operators of high-volume, automated call centers and the kind of calls they make. There is no provision for an individual who works entirely for himself, and who may only make calls in his immediate neighborhood, to be able to access the list and therefore to avoid making calls to numbers on the list.

It should be noted that a number of legitimate small businesses and independent business persons fall into this category. In addition to insurance agents, these would include real estate agents, auto salesmen, stockbrokers, etc.

We ask the Tennessee Regulatory Authority to either determine that the existing and proposed regulations do not apply to these business persons or to provide a reasonable method for them to comply with the regulations.

Reasonable compliance could be achieved by authorizing the long-standing trade and professional associations serving these occupations to access the list and to distribute applicable portions of it to their members. We would be willing to pay the basic \$500 fee and to operate the necessary computer and electronic equipment to maintain the latest list available from the TRA.

We are available to work with TRA staff to develop reasonable and workable procedures to accomplish the intended purpose of the legislation establishing the registry, while at the same time allowing hundreds of small, independent business persons to continue their legitimate business pursuits.

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